

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JAMES CONTANT, MARTIN-HAN TRAN, CARLOS GONZALEZ, UGNIUS MATKUS, JERRY JACOBSON, and PAUL VERMILLION, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

BANK OF AMERICA CORPORATION; BANK OF AMERICA, N.A.; MERRILL LYNCH, PIERCE, FENNER & SMITH, INC.; THE BANK OF TOKYO MITSUBISHI UFJ LTD.; BARCLAYS BANK PLC; BARCLAYS CAPITAL INC.; BNP PARIBAS GROUP; BNP PARIBAS NORTH AMERICA, INC.; BNP PARIBAS SECURITIES CORP.; BNP PARIBAS PRIME BROKERAGE, INC.; CITIGROUP INC., CITIBANK, N.A.; CITICORP; CITIGROUP GLOBAL MARKETS INC.; CREDIT SUISSE GROUP AG; CREDIT SUISSE AG; CREDIT SUISSE SECURITIES (USA) LLC; DEUTSCHE BANK AG; DEUTSCHE BANK SECURITIES INC.; THE GOLDMAN SACHS GROUP, INC.; GOLDMAN, SACHS & CO.; HSBC HOLDINGS PLC; HSBC BANK PLC; HSBC NORTH AMERICA HOLDINGS, INC.; HSBC BANK USA, N.A.; HSBC SECURITIES (USA) INC.; JPMORGAN CHASE & CO.; JPMORGAN CHASE BANK, N.A.; MORGAN STANLEY; MORGAN STANLEY & CO., LLC; MORGAN STANLEY & CO. INTERNATIONAL PLC; RBC CAPITAL MARKETS LLC; ROYAL BANK OF SCOTLAND GROUP PLC; RBS SECURITIES INC.; SOCIÉTÉ GÉNÉRALE S.A.; STANDARD CHARTERED BANK; UBS AG; UBS GROUP AG; and UBS SECURITIES LLC,

Defendants.

Case No. 17-CV-3139-LGS
Rel. 13-CV-7789-LGS

**RULE 7.1 CORPORATE
DISCLOSURE
STATEMENT OF
DEFENDANTS
CITIGROUP INC.,
CITICORP LLC,
CITIBANK, N.A., AND
CITIGROUP GLOBAL
MARKETS INC.**

ECF CASE

Pursuant to Federal Rule of Civil Procedure 7.1, the undersigned counsel of record for defendants Citigroup Inc., Citicorp LLC, Citibank, N.A., and Citigroup Global Markets Inc. states as follows:

Citigroup Inc., a publicly held corporation, has no parent corporation and, based on a review of publicly available reports filed on the US Securities and Exchange Commission's EDGAR system, no publicly-held corporation owns 10 percent or more of its stock.

Citicorp LLC is wholly owned by Citigroup Inc. Citigroup Inc., a publicly-held corporation therefore owns 10 percent or more of the stock of Citicorp.

Citibank, N.A. is wholly owned by Citicorp LLC, which in turn is wholly owned by Citigroup Inc. Citigroup Inc., a publicly-held corporation, therefore indirectly owns 10 percent or more of the stock of Citibank, N.A.

Citigroup Global Markets Inc. is an indirect wholly owned subsidiary of Citigroup Inc. Citigroup Inc., a publicly-held corporation, therefore indirectly owns 10 percent or more of the stock of Citigroup Global Markets Inc.

Dated: New York, New York
May 8, 2017

Respectfully submitted,
COVINGTON & BURLING LLP

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*Attorneys for Defendants Citigroup
Inc., Citicorp LLC, Citibank, N.A., and
Citigroup Global Markets Inc.*